

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	x Chapter 11
CarePoint Health Systems Inc. d/b/a Just Health	: Case No. 24-12534 (JKS)
Foundation, et al., ¹	: <i>Jointly Administered</i>
Debtors.	: : :

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**FIRST SUPPLEMENTAL DECLARATION OF LOUIS E. ROBICHAUX IV IN SUPPORT OF
APPLICATION OF THE DEBTORS FOR ENTRY OF AN ORDER (I)
AUTHORIZING THE DEBTORS TO RETAIN ANKURA CONSULTING
GROUP, LLC AS FINANCIAL ADVISOR TO THE DEBTORS AND (II)
GRANTING RELATED RELIEF
EFFECTIVE AS OF THE PETITION DATE**

I, Louis E. Robichaux IV, being duly sworn, state the following under penalty of perjury and that the following is true and correct to the best of my knowledge, information, and belief:

1. I submit this declaration (this “**First Supplemental Declaration**”) as a supplement to my declaration, dated November 13, 2024 (the “**Initial Declaration**”) in support of the *Application of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain Ankura*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center. The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

Consulting Group, LLC as Financial Advisor to the Debtors and (II) Granting Related Relief Effective as of the Petition Date [Docket No. 132] (the “**Application**”).²

2. This First Supplemental Declaration has been prepared in accordance with paragraph 8 of the Initial Declaration, which provides that Ankura will promptly supplement the disclosures in the Initial Declaration if any new material relevant facts or relationships are discovered or identified during these chapter 11 cases. Further, I submit this First Supplemental Declaration at the request of the Office of the United States Trustee to specifically disclose certain connections set forth on Schedule 2 of the Initial Declaration.

3. In the Initial Declaration, there were three Potential Parties-in-Interest that are related to the Debtor. The three Potential Parties-in-Interest and their relationship with Ankura and the Debtors are further explained below:

- a. Ankura provided financial due diligence services to BMC Hospital related to the purchase of certain assets of IJKG Opco dba Bayonne Medical Center between the period March 31, 2020, and July 13, 2020. This matter is now closed.
- b. Ankura provided to the UK Health Security Agency (UKHSA) an audit of accounts payable providers (otherwise known as a PCR audit) where Just Health was neutral between the period August 15, 2021 and January 11, 2022. This matter is closed and a final bill was provided on January 11, 2022.

² Capitalized terms used but not otherwise defined herein shall have the respective meaning ascribed to such terms in the Application.

- c. Ankura has an active engagement with a third-party payor over a payor / provider dispute where Hudson Hospital Opco dba CarePoint Health Christ Hospital, IJKG Opco, LLC dba CarePoint Health Bayonne Medical Center, and HUMC Opco, LLC dba CarePoint Health Hoboken Medical Center are adverse parties (the **“Third-Party Payor Dispute”**).

4. The Third-Party Payor Dispute has at all times been performed by Ankura personnel (the **“Third-Party Payor Personnel”**) that operate in an Ankura practice group that at all times relevant have been (and remain) separate and distinct from the practice group of professionals providing services to the Debtors (the **“Turnaround & Restructuring Personnel”**). None of the Third-Party Payor Personnel have worked on this restructuring matter and none of the Turnaround & Restructuring Personnel have worked on the Third-Party Payor Dispute. Ankura instituted an informational wall on March 22, 2024, between the Third-Party Payor Personnel and the Turnaround & Restructuring Personnel and no confidential information has been shared between these groups regarding the matter on which the other group is working. Ankura’s information wall is handled in a two-part process. The respective engagement teams are required to review and affirmatively sign an information wall agreement which includes the specific details of the purpose of the wall, to the extent that it does not breach client confidentiality, as well as their obligations under the ethical wall. Ankura’s Information Technology Support then restricts the project folder(s) so that only those with executed agreements received and approved by Client Intake & Conflict Management will be granted authorization to access the files.

5. Ankura will continue to apply the Firm Procedures during the pendency of the chapter 11 cases. To the extent any information disclosed herein requires amendment or

modification in connection with any additional Potential Parties-in-Interest provided to Ankura, Ankura will promptly file a further supplemental declaration stating such amended or modified information.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: December 8, 2024

/s/ Louis E. Robichaux IV

Louis E Robichaux IV
Senior Managing Director
Ankura Consulting Group, LLC